



National Association of State EMS Officials

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November 28, 2006

Mr. Kevin L. Martin, Chairman
Federal Communications Commission
Washington, D.C. 2055

Re: Docket RM No. 11348. Reallocation of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) from Commercial Use and Assignment of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) To the Public Safety Broadband Trust for Deployment of a Shared Public Safety/Commercial Next Generation Wireless Network

Dear Mr. Martin:

The National Association of State Emergency Medical Services Officials (NASEMSO) is the national leadership organization for EMS whose members are the state EMS directors, medical directors and other officials responsible for guiding their statewide EMS systems. The Association submits these Comments addressing the Petition for Rulemaking filed by Cyren Call Communications, Inc. (Cyren Call).

Our Association is an active member in the National Public Safety Telecommunications Council (NPSTC). We have therefore participated in the formulation and approval of NPSTC's comments in response to this docket. Nothing in this filing diminishes the importance of the broader considerations that constitute NPSTC's comments. We are primarily commenting on the specific report recommendations related to the emergency medical services community in this nation.

To that end, we attach the NASEMSO member resolution on the following page.

If you have any questions, please contact the Communications Technology Advisor for NASEMSO, Kevin McGinnis at 703-967-6515.

Respectfully submitted,

Fergus Laughridge,
President



**Resolution 2006-05
Emergency Medical Services and Public Safety
Communications**

Whereas, the National Association of State Emergency Medical Services Officials (NASEMSO) recognizes the need for an improved national system to assure the availability of voice, data, and other communications for emergency medical services (EMS) and for other public safety disciplines; and

Whereas, EMS communications systems and their capabilities have remained largely unchanged for the past 35 years; and

Whereas, the future ability of EMS providers to successfully treat life-threatening illnesses and injuries will depend on evolving diagnostic, treatment, and resource-coordination technologies linked to emerging communications systems with broadband capability; and

Whereas, these new communications systems will require significant additional new bandwidth in the public safety communications spectrum; and

Whereas, some of this required bandwidth is likely to be in the current 24 MHz public safety allocation at 700MHz; and

Whereas, public safety as a whole needs additional spectrum beyond that current 24 MHz allocation at 700 MHz; and

Whereas, at least one petition has been submitted to the Federal Communications Commission (FCC) to dedicate to public safety an additional 30 MHz of adjacent spectrum in the 700MHz range which was originally intended for public auction.

Now, therefore be it resolved the National Association of State Emergency Medical Services Officials (NASEMSO) will join other public safety organizations to advocate such a reallocation of that spectrum and to further develop proposals for a public/private partnership, with significant public safety community oversight, to develop a national public safety broadband network using that spectrum.

Signed this 6th day of October, 2006.

Robert R. Bass, M.D.
NASEMSO 2004-06 President

Shawn Rogers
NASEMSO 2005-06 Secretary

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